

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)	
)	CC Docket No. 96-45
Federal-State Joint Board on)	CC Docket No. <u>97-160</u>
Universal Service.)	DA 98-71

MOTION TO ACCEPT LATE-FILED COMMENTS

Pursuant to Sections 1.46(b) and 1.415(d) and (e) of the Commission's Rules, Sprint requests that the Commission accept these late filed comments as part of the record in this proceeding. Due to a power outage in its Kansas City office Sprint was unable to process the pleading in time to file by the Commission's 5:30pm closing time.

Respectfully submitted,

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SUMMARY

In this filing, Sprint Corporation ("Sprint") offers its view of the principles upon which a universal service support system should be built. Sprint stresses that the current system of implicit, inefficient, and untargeted subsidies is unsustainable and will never result in local competition. In order to reach the goals set for in the Telecommunications Act of 1996, Sprint assert that the USF support system must instead be explicit, sufficient, competitively neutral and serve the public interest. Until such a support mechanism exists, no meaningful, facilities-based competition can take hold. With that in mind, Sprint proposes that a plan be based on the following principles:

- Fund support must be based on forward-looking costs;
- There must be a national fund, assessed on both intrastate and interstate retail revenues;
- A federal benchmark must be established to serve as the maximum affordable local service rate (where a cost-based rate would be prohibitive);
- Implementation of the plan must be revenue- neutral at its inception; and
- Carrier recovery of the USF obligation must be through a surcharge on all retail services from end user customers.

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PROPOSAL OF SPRINT CORPORATION

Since the time of the Commission's Report and Order¹ in this matter, several parties have offered suggestions for ways to modify the methodology for determining universal service support. The Commission has resolved that it is appropriate to augment the record in this matter by permitting comment on those proposals already submitted, as well as granting to all interested parties the opportunity to tender their own suggestions. In response to the Commission's April 15, 1998 Public Notice, Sprint Corporation ("Sprint") respectfully offers the following universal service proposal, setting forth the general principles that should govern the new high cost fund.

I. INTRODUCTION

Since the passage of the Telecommunications Act of 1996 ("the Act"),² the Commission, segments of the industry and Congress have been focused intently on the goal of fostering competition in the local exchange. Although different

¹ *Federal State Joint Board on Universal Service, Report & Order*, CC Docket No. 96-45, 12 FCC Rcd 8776 (1997) ("the Order").

² Telecommunications Act of 1996, Pub. L. 104-104.

parties have different perspectives concerning that goal, all have funneled a great deal of attention, energy, and resources into the issue. Sprint has actively participated in the many dockets and debates from which the rules for local competition will grow. It fears, however, that amidst all the rumblings, rhetoric, and ruminations, the fundamental issue of profitability will be lost. No entity will willingly enter a market unless the sum of their anticipated revenues exceeds the sum of their anticipated costs. Until that occurs, there will never be vibrant, facilities-based competition in the local exchange.

This is more than an issue of urban versus rural. No meaningful, facilities-based competition will exist – whether in Manhattan, New York or in Manhattan, Kansas – unless and until the provision of such service is profitable. It is entirely possible that a subsidy can make such service profitable, and such a subsidy may be good public policy, but that subsidy should be targeted, efficient, explicit and, of course, competitively neutral.

The current system of implicit, inefficient, untargeted subsidies is totally unsustainable and will never permit local competition. In looking at a representative sample of its local customers, Sprint has shown that the current rate structure impedes facilities-based competition, particularly in the residential market, where only 29% of its customers generate profits. That is not a very attractive market to most investors. Similarly, only 77% of its business customers are profitable to serve -- an improvement over the residential market, but still not a business case that will attract new capital.

Although the sale of other services contributes to a firm's profitability and the existing high cost fund contributes as well, the tangled web of counter-productive pricing schemes must be removed. The current rate structure, with its implicit subsidies is also very inefficient and untargeted. Those customers who are intended to be the beneficiaries of the subsidies pay a large portion of the subsidy. Over half of the subsidy to residential local service is provided by the residential customers themselves.

Likewise, the public deserves to know what it can expect from the fund. There has been an on-going campaign by some to confuse the issue and frighten consumers into believing that they will be paying significantly more for telecommunications service. The Commission must ignore these scare tactics and remember that a sizeable, implicit and untargeted fund exists today. Funded by existing implicit subsidies, the fund is estimated to contain somewhere between 13 and 20 billion dollars. Consequently, the immediate result of this docket will not be the creation of additional charges that consumers are not already paying; rather it will be the creation of explicit subsidies to replace the implicit subsidies that now support the fund. The long-term result of the Commission's action will be a specific and predictable funding mechanism, as envisioned by Congress...and the removal of a significant barrier to entry for would-be local competitors.

II. REQUIREMENTS OF THE ACT

Congress has already set down the primary principles upon which USF policy is to be based. Under Section 254(b), quality services are to be provided at affordable rates and consumers in rural, high cost areas are to receive services comparable to those provided in urban areas at comparable rates. Section 254(d) requires that:

[e]very telecommunications carrier that provides interstate telecommunications services shall contribute, on an equitable and nondiscriminatory basis, to the specific, predictable, and sufficient mechanisms established by the Commission to preserve and advance universal service (emphasis added).

The regulatory principles embodied in this statute – principles adopted by the Commission in this and related dockets – may be summarized in one statement: the USF support system must be explicit, sufficient, competitively neutral and serve the public interest.

In its May 8, 1997 Report and Order, the Commission reviewed the Act's directives for universal service and, in accordance with Section 254(b)(7) declared that "competitive neutrality was an additional principle upon which universal service policies would be based."³ The Commission defined competitive neutrality to mean that:

...universal service support mechanisms and rules neither unfairly advantage nor disadvantage one provider over another, and neither unfairly favor nor disfavor one technology over another.⁴

³ Order at ¶46.

⁴ *Id.*, at ¶47.

Recognizing the invaluable role the notion of competitive neutrality would play in the determination of universal service policies, the Commission maintained that:

...an explicit recognition of competitive neutrality in the collection and distribution of funds and determination of eligibility in universal service support mechanisms is consistent with congressional intent and necessary to promote "a pro-competitive, de-regulatory national policy framework." ...We conclude that competitively neutral rules will ensure that such disparities are minimized so that no entity receives an unfair competitive advantage that may skew the marketplace or inhibit competition by limiting the available quantity of services or restricting the entry of potential service providers.⁵

Employing these principles, Sprint believes that, in order to establish universal service support that is specific, predictable, equitable and competitively neutral, comprehensive reform must take place. Specifically, implicit subsidies that exist today must be eliminated. In their place, an explicit, competitively neutral universal service fund must be instituted in which the industry rearranges the flow of existing revenues to make subsidies explicit and allows the marketplace to bring other charges to equilibrium.

Sprint recognizes that rate re-balancing is a controversial concept but contends that the time has come to accept the fact that residential rates are artificially low and the implicit subsidies buried in other services can not endure in a competitive marketplace and are a deterrent to local competition. The fact is that prices for local residential services have been kept artificially low, having

⁵ *Id.*, at ¶48.

been arrived at through residual ratemaking. Added to this incongruity is the fact that most of the subsidies generated to keep residential rates low are supplied by residential customers themselves through inflated toll or optional service feature rates. Data from Sprint's local division suggests that approximately two-thirds of the subsidies flowing to local basic service come from local customers. It is, therefore, time to recognize that this past approach to ratemaking for local service can no longer be sustained, both as a matter of economics (to the extent that local competition develops) and as a matter of law (due most notably to the prohibition on implicit subsidies contained in Section 254 and the admonition against state-imposed barriers to entry in Section 253).

If rate re-balancing is not accomplished in a timely fashion, then at the very least, subsidies must be made explicit and a competitively neutral USF funding mechanism must be adopted. This necessarily requires all carriers to contribute to the fund on the basis of both intrastate and interstate revenues and to recover their contributions from their end user customers. Anything less risks both the creation of new subsidies and the undermining of competition.

Sprint is confident that a plan built upon the foundation of the statutory precepts - equity, specificity, predictability and sufficiency – overlaid with the Commission's principle of competitive neutrality, will result in a plan that is in the public interest.

III. SPRINT'S PROPOSED PRINCIPLES

Considering the directives embodied in the Act, as outlined above, Sprint has devised a universal service plan framework for the Commission's consideration. The plan is based on the following principles (discussed in detail below):

- Fund support must be based on forward-looking costs;
- There must be a national fund, assessed on both intrastate and interstate retail revenues;
- A federal benchmark must be established to serve as the maximum affordable local service rate (where a cost-based rate would be prohibitive);
- Implementation of the plan must be revenue- neutral at its inception; and
- Carrier recovery of the USF obligation must be through a surcharge on all retail services from end user customers.

a. Fund support must be based on forward-looking costs.

The amount of the federal subsidy should be set at the difference between the forward-looking cost of providing the service and the benchmark affordable price. As the Commission has recognized, using a forward-looking cost methodology as the starting point in calculating the support amount is appropriate since it enables the Commission to arrive at a rate that emulates competitive market conditions.⁶ As compared to an embedded cost methodology, a forward-looking approach better reflects the costs to a competitor to enter the market, as well as the cost of an efficient network -- which is what Congress desired and consumers deserve.

⁶ The Commission's Order rightly reflects this principle. See, 12 FCC Rcd at ¶224-226.

- b. *There must be a national fund, assessed on both intrastate and interstate retail revenues.*

The Commission has stated, both in its May 8th Order and in its recent Report to Congress, that Section 254 grants it the authority to create a national fund made up of contributions from intrastate as well as interstate revenues. To date, the Commission has declined to exercise that authority with respect to the high cost fund. Sprint believes that, in order to ensure competitive neutrality, as well as sufficient support flow between states, a national fund is not only reasonable, but essential.

To assess USF contributions on only interstate revenues effectively exempts ILECs from contributing to universal service support. There can be no question but that local carriers benefit from universal service – the ability of a LEC end user to reach other subscribers in remote, high-cost areas enhances the overall value of local service in low-cost urban areas. However, if the LEC serving those areas is not required to contribute its fair share toward universal service support, then the burden of serving these high-cost customers will be shifted disproportionately to interstate carriers and their customers. Likewise, those states comprised of high-cost, rural territories would shoulder more of the USF burden since they would have a comparatively smaller revenue base contrasted to low-cost, urban states.

Therefore, in order to fulfill Section 254(d)'s sufficiency requirement in terms of size, as well as its caution that carrier contributions be equitable and non-discriminatory, the fund must be national in scope.

- c. *A federal benchmark must be established to serve as the maximum affordable local service rate (where a cost-based rate would be prohibitive).*

The establishment of a federal benchmark rate for local service costs will help ensure that customers and carriers, wherever they are situated, are treated equitably. Toward that end, Section 254(b)(1) requires that service be available to all subscribers at rates that are "affordable". Consequently, it is appropriate that the federal benchmark price of basic service meet that same 'affordability' standard. In determining what qualifies as affordable, Sprint first notes that is not necessary to fix the benchmark rate at a level deemed affordable by low-income subscribers. Separate funding sources are dedicated to assuring that low-income subscribers are able to remain on the network.

Moreover, since the benchmark is intended to be a measure of "affordability," the appropriate standard is the basic local service rate, not average revenues. A revenue benchmark that includes other revenues, particularly in this case interstate access revenues, not only does not provide a measure of affordable rates for basic service, it also entails an illogical circularity. As previously discussed, the purpose of the new universal service fund should be to replace implicit subsidies with an explicit, competitively neutral universal service fund. To the extent that a revenue benchmark, which includes the

revenues from existing implicit subsidies, is used, it will fail to provide the necessary USF funding to accomplish the policy goal of eliminating implicit subsidies. Indeed, under the revenue benchmark approach, the higher the level of subsidies embedded in current rates, the lower the need for USF support. Conversely, if, as Sprint urges, new USF dollars are used to reduce existing implicit subsidies, and if, contrary to Sprint's position, a revenue benchmark is employed, the result will be as follows: the new USF will reduce implicit subsidies, which will reduce the revenues used in the benchmark, which will require a higher USF fund, which will reduce subsidies even more, which will further reduce the revenue benchmark, ad infinitum.

Determining the precise level of an "affordable" local rate requires some degree of judgment, although the preponderance of evidence clearly suggests that increases in basic local rates will have no or little impact on penetration levels (particularly considering that customers, although paying higher local rates, will be reaping the benefits of lower toll rates). However, the Commission should recognize the policy trade-off in making its determination of affordability: the lower the "affordable" rate, the higher the size of the USF that is needed to fund the difference between that rate and the forward-looking costs of providing universal service. As noted above, the true size of the existing "universal service fund" (the implicit subsidies as well as the existing high cost support) is huge. The only way to reduce the size of this subsidy fund is to move cost recovery back to the cost causer--the basic local exchange service.

Sprint believes that some degree of rate rebalancing--i.e., increases in basic local rates accompanied by offsetting reductions in implicit subsidies--is appropriate. Sprint also recognizes that it is the states, not the Commission, that has ultimate responsibility for making determinations regarding rate rebalancing. However, the Commission should also not take on the burden of subsidizing local rates at current levels. Sprint therefore urges the Commission to adopt an "affordability" standard that provides a more realistic measure of what subscribers should pay for basic local service, and provide national USF funding only to that level. The individual states, then, can elect to raise local rates to that affordability level, to fund the difference between existing local rates and that national benchmark through an intrastate only USF, or some combination thereof.

d. Implementation of the plan must be revenue-neutral.

The goal of universal service is to ensure that subscribers, regardless of income level or physical location, have access to quality telecommunications services at reasonable and affordable rates. Consequently, the support system adopted should not be capable of manipulation such that carriers are able to turn universal service into a revenue-making opportunity. With that in mind, a cornerstone of Sprint's plan is that universal service support must be revenue-neutral at its inception. In other words, Sprint asserts that, any ILEC receiving an increase in universal service support payments above current USF funding

should be required to offset that increase, dollar for dollar, through decreases in access charges.

Consumers will ultimately be the beneficiaries of this facet of Sprint's plan. History shows that the long distance industry has consistently decreased toll rates by more than ILEC access reductions. For its part, Sprint's long distance company has steadfastly passed access reductions through to its customers in the form of lower rates, and will continue to do so.

Because of the competitive market conditions, which unarguably exist in the long distance market, Sprint maintains that the customer benefits from the reduction in access charges proposed here reach beyond reductions in basic toll rates. For example, telecommunications services are a significant input factor to manufacturers in the production process of many goods. Lower access costs, and the resulting reduction in toll prices, reduce the production cost of these goods much to the benefit of the consuming public. Moreover, many users avail themselves of 800/888/877 "toll free" services. Between 1995 and 1997, Sprint toll free calling has increased approximately 60% as the subscription price for the service has declined far in excess of overall telecommunications prices, leading many social service agencies, retailers and others to offer toll-free service to their constituents/customers.

It is evident that the access reductions proposed as a part of Sprint's plan will work to provide customers with the benefits that competition brings.

- e. *Carrier recovery of the USF obligation must be through a surcharge on all retail services from end user customers.*

Sprint is fully cognizant of the current controversy regarding the use of end user surcharges as a recovery mechanism for USF contributions. However, Sprint contends that a surcharge meets each of the criteria advanced by Congress in Section 254(d). As a separate line item on the bill, the subsidy is explicit. Further, a surcharge ensures that all providers will make a fair and equitable contribution to the fund. Finally, the fact that a surcharge would appear on every customer's bill, regardless of the identity of the service provider, ensures competitive neutrality.

The end user surcharge is the key to any workable USF plan.⁷ Without it, competitive neutrality, both in terms of contribution levels and recovery, is a virtual impossibility. Without it, one segment of the industry and its customers will be forced to contribute a disproportionate share of the monies to the fund.⁸ Without it, implicit subsidies will continue to exist. Without it, barriers to entry for competitive carriers will continue to exist.

The fact is, because implicit subsidies exist today, end users are already supporting the universal service fund. Consequently, the removal of these implicit subsidies, replaced with the explicit surcharge, will not result in an overall increase in consumer charges. With appropriate consumer education,

⁷ This reasoning applies to the Schools and Libraries fund as well.

⁸ Currently, IXC's are shouldering 96.5% of explicit LEC contributions to USF funds through access charges. In total, IXC contributions account for 90% of total USF funding.

there is no reason that the implementation of the USF surcharge should result in subscriber angst or anger. Neither is there any reason to believe that a surcharge would cause a drop in subscriber penetration rates. Examples of this fact are borne out by states that have already adopted end user surcharges for funding of state universal service funds.

For example, in March of 1997, the state of Kansas (a relatively rural state) instituted a universal service subscriber surcharge.⁹ In spite of the addition of the charge, Sprint's local division has experienced continued growth in access lines in that state. Following the implementation of the surcharge, Sprint and other major long distance carriers reduced their long distance prices. In Sprint's case, the access "flow-through" or price reductions, measured on an annual basis, exceeded the access reductions. While the relationship between local prices, long distance prices and customer subscription levels is exceedingly complex, as least as far as Kansas is concerned, a summary conclusion would indicate that there has been no drop off in local subscription levels, long distance prices have declined and minutes of use have increased dramatically, in response to the implementation of the surcharge.

The more urban state of California instituted its end user surcharge in February 1997. The surcharge is 2.87% of the total monthly bill. While overall subscribership penetration rates for 1997 are not available, early indications are

⁹ Wireless carriers are basing the surcharge on 9.8% of the customer's total bill; local exchange carriers are billing a flat-rate surcharge.

that the institution of the surcharge has not caused users to go off the network.¹⁰

These numbers certainly do not suggest that the end user surcharge has had a negative impact of customer penetration or usage rates.

Applied in conjunction with rate re-balancing or, at a minimum, the removal of implicit subsidies, an end user surcharge will not harm overall subscriber penetration rates, yet will have a positive impact on the state of competition.

IV. CONCLUSION

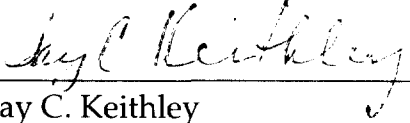
Sprint applauds those aspects of the Commission's revised high cost universal service support mechanism that embrace the concept of forward-looking costs as a basis for such support. Sprint strongly encourages the

¹⁰ Average penetration rates for California for 1996 sat at 95.65%. First quarter results for 1997 of 95.1% reflect no appreciable change in that rate. (Source, FCC's Report on Telephone Subscribership in the United States, issued May, 1997).

Commission to revise the remaining aspects of its high cost support mechanism
so as to fully reflect the positions set forth herein.

Respectfully submitted,

SPRINT CORPORATION

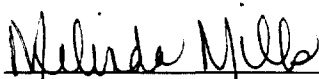
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CERTIFICATE OF SERVICE

I, Melinda L. Mills, hereby certify that I have on this 27th day of April 1998, served via U.S. First Class Mail, postage prepaid, or Hand Delivery, a copy of the foregoing "Proposal of Sprint Corporation" in the Matter of Federal State Board on Universal Service, CC Docket Nos. 96-45 and 97-160, DA 98-71, filed this date with the Secretary, Federal Communications Commission, to the persons on the attached service list.



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